



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL PUBLIC HEALTH
PO Box 47820 • Olympia, Washington 98504-7820
(360) 236-3000 • TTY Relay Service: (800) 833-6384

April 4, 2019

Mr. Sean J. Gamble, Esq.
Friedman | Rubin®
1109 1st Avenue, Suite 501
Seattle, Washington 98101

Dear Mr. Gamble:

We received your March 19, 2019 letter and consultant opinion regarding sampling results for chemicals at the Sky Valley Education Center in Monroe, Washington. Thank you for letting us know about the sample results. We also received a request from Snohomish Health District to assist in interpreting the sample results. We are taking steps to collect additional information in order to evaluate any potential health risks.

With regard to PCBs, we have confidence in previous extensive rounds of professional air and wipe sampling conducted after PCB abatement at this school between 2016 and 2018. This testing was mandated by the EPA Corrective Action Plan as a way to assure PCB risks continue to be well controlled until the buildings are remodeled or demolished. These tests show PCB abatement was successful at the school and ongoing cleaning is keeping encapsulated PCBs out of classroom air and accessible surfaces.

With respect to the dioxin and furan results, we are missing the necessary information to evaluate either quality or significance of these samples.

- Normal documentation for a school sampling effort is missing. There was no sample plan provided, no description or documentation of sample collection procedures, and no final report from Environmental Health & Engineering. These documents would describe critical quality control protocols needed in sample collection for dioxins and furans. They would report on the quality assurance of field work such as whether there was evidence of cross-contamination of samples during sampling and transport.
- Dust and carpet samples appear to have been collected from inaccessible locations that are not representative of occupied space at the school.
- Wipe samples did not have information about surface area wiped or whether a standardized surface area was used.
- Sample numbers are not consecutive, leaving us to wonder whether duplicate samples or inconsistent results were omitted.

Mr. Sean Gamble
April 4, 2019
Page 2

- It is inappropriate to compare soil screening levels to these dust samples. Soil numbers are derived from exposure scenarios such as gardening and child ingestion while playing in soil. None of these scenarios are relevant to indoor dust from inaccessible spaces.
- Deposited dust in the air handling system can't be used to reconstruct occupant inhalation exposure without detailed pre and post-sampling and a known volume of air.

As you probably know, dioxins and furans are ubiquitous in air and are carried on air particles which may be trapped by building air filters. Samples from inside air ducts, heaters and unit ventilators may reflect concentrated ambient particulate levels of dioxins and furans that have deposited over time in dust around devices that handle large volumes of air. We are working with our local health partners and the school to assess the need for further cleaning, or sampling.

Again, thank you for bringing this to our attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clark Halvorson', with a long horizontal line extending to the right.

Clark Halvorson
Assistant Secretary, EPH